

FILED

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

JAN 19, 2012

CLERK
U. S. DISTRICT COURT
MIDDLE DIST. OF ALA.

UNITED STATES OF AMERICA)	
)	CR. NO. <u>2:12cr20-MHT</u>
v.)	[18 U.S.C. § 2;
)	18 U.S.C. § 286;
CHIQUITA SMITH)	18 U.S.C. § 1028(a)(7); and
)	18 U.S.C. § 1028(b)(1)(D)

INDICTMENT

The Grand Jury charges:

COUNT 1

Between on or about June 13, 2010 and March 25, 2011, in Montgomery County, within the Middle District of Alabama, the defendant,

CHIQUITA SMITH,

knowingly and willfully entered into an agreement, combination, and conspiracy with others known and unknown to the Grand Jury, to defraud the United States by obtaining and aiding to obtain the payment and allowance of false, fictitious, and fraudulent claims, to-wit: the payments of refunds generated by falsely filed tax returns in the manner and means as follows:

1. It was part of the conspiracy that defendant Chiquita Smith used a pass key to the State of Alabama Department of Human Resources she had obtained during her employment with Vinson Guard Service, Inc., to gain entrance to the State of Alabama Department of Human Resources for herself and two other people.

2. It was a further part of the conspiracy that, while the defendant Chiquita Smith and the two other people were in the State of Alabama Department of Human Resources, they did steal names, Social Security numbers, and dates of birth of persons who received services from the State of Alabama Department of Human Resources.
3. It was a further part of the conspiracy that defendant Chiquita Smith stole names, Social Security numbers, and dates of birth of her co-workers at Vinson Guard Service, Inc. and supplied these names, Social Security numbers, and dates of birth to a conspirator whose identity is known to the grand jury.
4. It was a further part of the conspiracy that these stolen names, Social Security numbers, and dates of birth were used to prepare fraudulent tax returns.
5. It was a further part of the conspiracy that refunds generated from these fraudulently prepared tax returns were placed on prepaid debit cards.
6. It was a further part of the conspiracy that a conspirator used Automated Teller Machines to retrieve the refunds from the prepaid debit cards.

All in violation of Title 18, United States Code, Section 286.

COUNTS 2-8

Between on or about June 13, 2010 and March 25, 2011, the exact dates being unknown to the Grand Jury, in Montgomery County, within the Middle District of Alabama, the defendant,

CHIQUITA SMITH,

did knowingly transfer, possess, and use in and affecting interstate commerce, without lawful authority, a means of identification of another person, listed below, with the intent to commit, and to aid or abet, and in connection with, any unlawful activity that constitutes a violation of Federal law, to wit, theft of government property, and as a result of the offense, the defendant and a conspirator, whose name is known to the Grand Jury, obtained anything of value aggregating \$1,000 or more during any 1-year period, in violation of Title 18, United States Code, Section 1028(a)(7) and Section (b)(1)(D) and Title 18, United States Code, Section 2.

COUNT	NAME TO WHOM THE ACCESS DEVICE HAD BEEN ISSUED
2	M. M.
3	D. B.
4	T. M.
5	V. B.
6	B. F.
7	N. S.
8	C. A.

A TRUE BILL:

Cynthia Darden
Foreperson

GEORGE L. BECK, JR.
UNITED STATES ATTORNEY

W. Brent Woodall
W. Brent Woodall
Assistant United States Attorney